

**REMARKS**

Claims 1, 3-33 and 35 are pending in this application. By this Amendment, claims 1, 3, 8, 9, 12, 13, 16, 17 and 28 are amended. Claim 1 is amended to included the subject matter recited in now-canceled claim 2. The other claims are amended to correct informalities and for consistency. The amendments introduce no new matter. Claim 2 is canceled without prejudice to, or disclaimer of, the subject matter recited in that claim. A Request for Continued Examination is attached. Reconsideration of the application based on the above amendments and the following remarks is respectfully requested.

Applicant appreciates the indication of allowability regarding claims 4-7, 12-15, 20-23 and 28-31.

The Office Action objects to claim 16 for failing to include the proper claim status identifier. The status identifier of claim 16 is changed to reflect the current status of the claim. Withdrawal of the objection is respectfully requested.

The Office Action rejects claims 1, 2, 8-11, 18 and 24-27 under 35 U.S.C. §102(b) over U.S. Patent No. 5,701,369 to Moon et al. (hereinafter "Moon"); rejects claims 3 and 19 under 35 U.S.C. §103(a) over Moon in view of the article "Fractal Image Coating: A Review," Proceeding of the IEEE, Vol. 81, No. 10, Oct. 1993, pp. 1451-1465, (hereinafter "the Jacquin article"); rejects claims 16, 17, 32 and 33 under 35 U.S.C. §103(a) over Moon in view of U.S. Patent No. 6,002,794 to Bonneau et al. (hereinafter "Bonneau"); and rejects claim 35 under 35 U.S.C. §103(a) over Moon. These rejections are respectfully traversed.

Claims 18 and 35 recite, among other features, forming an improved domain block image based upon a result obtained by converting pixel values as to the reduced range block image based upon the similarity degree. Moon cannot reasonably be considered to have suggested this feature.

Regarding claim 18, the Office Action, on page 5, asserts that Moon, at col. 5, lines 54 through col. 6, line 14 and col. 7, lines 31-36, teaches forming an improved domain block image based upon a result obtained by converting pixel values as to the reduced range block image based upon the similarity degree. The Office Action, on page 10, makes similar assertions with respect to claim 35. These assertions are incorrect for the following reasons.

Moon merely discloses: in step 505, reducing a range block image to the size of the domain block; in step 509, performing a contractive transform upon a spatially transformed range block using Equation 1 disclosed in col. 6; in step 511, the control unit 20 determines whether the domain block processed in steps 505-509 is a final domain block; and in step 513, when the final domain block for the given range block is processed, control unit 20 advances and compares the mean square errors (MSE) between each of the spatially transformed domain blocks and the corresponding range block to find the domain block having the lowest mean square error. This domain block is selected as having the maximum degree of similarity to the corresponding range block. Importantly, the comparison for similarity in step 513 is performed after the pixel value conversion is performed in step 509. Accordingly, because the similarity comparison is performed after the pixel conversion is performed, Moon does not disclose forming the pixel value conversion based upon the similarity degree, as recited in claims 18 and 35.

Independent claim 1 recites, among other features, the improved domain block forming section performs the pixel value conversion based upon the similarity degree obtained by the similarity degree judging section. The Office Action asserts that control unit 20 of Moon performs a pixel value conversion based upon the similarity degree obtained by the similarity degree judging section. For reasons similar to those discussed above with respect to claims 18 and 35, Moon cannot reasonably be considered to have suggested this feature.

For at least the foregoing reasons, Moon cannot reasonably be considered to have suggested the combinations of all of the features positively recited in independent claims 1, 18 and 35. Additionally, claims 3, 8-11, 16, 17, 19, 24-27, 32 and 33 are also neither taught, nor would they have been suggested, by Moon, even in combination with the Jacquin article or Bonneau, which are not applied in a manner that would overcome of the above-identified shortfalls in the application of Moon to the subject matter of at least the base claims.

Accordingly, reconsideration and withdrawal of the §102(b) and §103(a) rejections of the claims as being anticipated by, or unpatentable over, the applied references are respectfully requested.

In view of at least the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable reconsideration and prompt allowance of claims 1, 3, 8-11, 16-19, 24-27, 32, 33 and 35, in addition to the indicated allowability of claims 4-7, 12-15, 20-23 and 28-31, are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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Attachment:  
Request for Continued Examination

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